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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

Plaintiff

§§§§§
CRIMNO. H-08-146

ELISA IDALIA CASTILLO, et al.
Defendants

§§§§§

SENTENCING MEMORANDUM OF ELISA IDALIA CASTILLO

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TO THE HONORABLE SIMEON LAKE, UNITED STATES DISTRICT JUDGE:

COMES NOW, ELISA IDALIA CASTILLO, ("Castillo") by and through her attorney of record Charles A. Bunker, III, and hereby files this Sentencing Memorandum in anticipation of her upcoming sentencing before the Court.

The advisory sentencing guideline calculation contained in the Presentence Report ("PSR") recommends an advisory sentencing of life imprisonment. Defendant requests this Honorable Court to consider a sentence "variance" in this case pursuant to 18 U.S.C. §3553(a).

I. OVERVIEW

Castillo submits this Sentencing Memorandum requesting the Court to grant her a sentence of ten (10) to fifteen (15) years' imprisonment, and presents factors for the Court to find that such a sentence is sufficient, but not greater than necessary, to satisfy the purposes of sentencing as set forth in 18 U.S.C. §3553(a).

Castillo asks this Court to depart downward and grant a non-Guideline sentence (a sentence "variance") in this case based on the following factors: (1) Castillo's offense conduct is overstated by the guidelines applicable to her case; (2) Castillo's age and lack of significant criminal history; (3) Castillo's naiveté and high susceptibility to manipulation; (4) the low probability that Castillo will re-offend; and (5) a combination of factors under U.S.S.G §5K2.0 and 18 U.S.C. §3553(a).

II. SENTENCING AFTER RECENT CHANGES BY THE SUPREME COURT OF THE UNITED STATES

A. The Court May Taylor a Sentence to a Particular Defendant

In *United States v. Booker*, 543 U.S. 220 (2005), a majority of the Supreme Court held that *Blakely v. Washington*, 542 U.S. 296 (2004) applied to the federal sentencing guidelines, and that the Sixth Amendment's jury trial guarantee prevented judges from finding facts that exposed a defendant to increased prison time. *Id.* At 244. As a remedy, a different majority of the Court excised the provision of the Sentencing Reform Act that made the guidelines mandatory. *Id.* At 244-45. The remedial majority held that district courts must still consider the guideline range, but must also consider the goals and factors set forth in 18 U.S.C. §3553(a). *Id.* The *Booker* Court held that sentences imposed by district courts "must be reasonable given the factors set forth in the Act." *Id.* At 260-61. The Court thus restored a district court's ability to fashion a sentence tailored to the individual circumstances of the case about each individual defendant. Recent decisions by the Supreme Court have affirmed the broad sentencing discretion district judges possess under *Booker* and have held that they may impose non-guideline sentences by either departing under the Guidelines or by applying the factors contained in §3553(a).

B. *Gall* Explains How Sentencing Should Proceed

Most recently, in *Gall v. United States*, 128 S. Ct. 586 (2007), the Supreme Court explained how sentencing in the district court should proceed. First, a district court must accurately calculate the applicable Guideline range. *Id.* at 596. After considering the correct Guideline range, including upward or downward departures, the district court must then consider all of the § 3553(a) factors to determine the appropriate sentence. *Id.* The district court "must make an individualized assessment based on the facts presented." *Id.* at 597. If the district court

determines that a sentence outside the Guidelines is most appropriate, it “must consider the extent of the deviation and ensure that the justification is sufficiently compelling to support the degree of the variance.” *Id.* See also *United States v. Munoz-Navar*, 524 F.3d 1137, 1146 (10th Cir. 2008). Further, *Gall* indicated that factors disfavored by the Sentencing Commission may otherwise be relied on by the district court in fashioning an appropriate sentence under § 3553(a). *Id.* at 602.

C. Requirements of 18 U.S.C. § 3553(a)

Section 3553(a) requires courts to “impose a sentence sufficient, but not greater than necessary, to comply with the purposes set forth in paragraph (2).” These purposes are:

- (A) to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense;
- (B) to afford adequate deterrence to criminal conduct;
- (C) to protect the public from further crimes of the defendant; and
- (D) to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner.

Section 3553(a) further directs sentencing courts to consider, among other things: (1) the nature and circumstances of the offense and the history and characteristics of the defendant; (2) the kinds of sentences available; (3) the kinds of sentence and the sentencing range established by the Sentencing Guidelines; (4) any pertinent policy statements issued by the Sentencing Commissions; and (5) the need to avoid unwanted sentencing disparities among defendants with similar records who have been found guilty of similar conduct.

D. There Is No Presumption that a Guideline Sentence Should Apply

Further, the Supreme Court has held that a guideline sentence may, on appeal, be presumed reasonable, but that the presumption of reasonableness “applies only on appellate review.” *Rita v. United States*, 127 S. Ct. 2456 (2007). The sentencing court “does not enjoy the

benefit of a legal presumption that the Guidelines sentence should apply.” *Id.* at 2465. Instead, the sentencing court, after determining the guideline range, may decide that the guideline sentence:

should not apply, perhaps because (as the Guidelines themselves foresee) the case at hand falls outside the ‘heartland’ to which the Commission intends individual Guidelines to apply, U.S.S.G. § 5K2.0, perhaps because the Guidelines sentence itself fails properly to reflect § 3553(a) considerations, or *perhaps because the case warrants a different sentence regardless*. Thus, the sentencing court subjects the defendant’s sentence to the thorough adversarial testing contemplated by federal sentencing procedure.

Id. (emphasis added). The *Rita* Court also was careful to note that, although the courts of appeal may presume reasonable a “within-guideline” sentence, they may not presume a non-guideline sentence to be unreasonable. *Id.* at 2467.

E. No Rigid Formula To Be Applied

Finally, the *Gall* Court explicitly invalidated the use of mathematical calculations in regard to the extent of a variance from the Guidelines. The Court held, “[w]e also reject the use of a rigid mathematical formula that uses the percentage of a departure as the standard for determining the strength of the justifications required for a specific sentence.” *Gall*, 128 S. Ct. at 595.

III. GROUNDS FOR GRANTING A NON-GUIDELINE SENTENCE

Pursuant to the Sentencing Guidelines and 18 U.S.C. § 3553(a), Castillo respectfully asks this Court to depart downward and grant a non-Guideline sentence in this case based on the evidence presented herein and as will be presented at the sentencing hearing.

A. Castillo’s Naïveté is Well Documented Both Pre-and Post-Conviction

During the trial of Castillo, it was well documented by every one of Castillo’s witnesses who testified on her behalf at trial, that Castillo is highly naïve, easily taken advantage of by

anyone who approaches her, and easily misled by anyone with an "agenda" who seeks to manipulate her. Castillo obtained the DOT classification at the request of Patricio Reynoso Galaviz. Castillo was introduced to Galaviz by her boyfriend, Martin Ovalle-Martinez. That Ovalle Martinez was an individual and co-defendant using Castillo's heretofore good name and business reputation to further the cause of insidious drug trafficking was well-established at trial. When Castillo was introduced to Patricio Reynoso Galaviz by her then boyfriend Ovalle as "a well-to-do businessman from Mexico," who was interested in investing in her business, she counted her good fortune for her business. She gladly placed the busses he paid for in cash in her name, and rented out her business name, "Lizma Tours," to Patricio Reynoso Galaviz and others [PSI 78]. Castillo's rationale for doing so was to prosper the business and continue to earn a moderate income for her family. She never thought that any illicit activities were transpiring.

All of Castillo's friends and family testified at her trial regarding how easily duped, naïve, and vulnerable Castillo is, and how she was regularly taken advantage of by the men in her life. First for six (6) years by Adan Ibarra (PSI 71), then for twenty-three (23) years with Jesus Cano, who regularly and consistently cheated on her. She never suspected him of this conduct until, after investing twenty-three (23) years into the relationship, she caught him with their baby sitter (PSI 70).

Finally, she met Martin Ovalle, the co-defendant, and despite her previous bad experiences with men, she trusted him completely, hung on his every word, and believed everything he said, even after she learned that he was and is currently legally married, with a wife and children in Mexico. She entered into a seven (7) year relationship with him (PSI 69).

Despite the outcome of the trial, Castillo still believed Ovalle-Martinez when he told Castillo that he knew nothing about the drug operation. It was her counsel, Charles A. Banker, III, who set her straight on that aspect and told her that Ovalle-Martinez confessed that he had

known about the illegal drug trafficking and money laundering which was going on the busses she had leased to the "co-conspirators." During that same attorney-client interview prior to the trial, Elisa Castillo made the comment regarding Ovalle to her counsel and his paralegal, "*He took care of me. I don't have a husband and I needed a man.*" Castillo appeared to be in deep denial that anyone – especially Ovalle, her boyfriend of seven (7) years – would take advantage of her in such a way. Castillo's logic and reasoning is that of about a fourteen (14) year old female who still believes in the type of relationships portrayed in *novellas* and Spanish soap operas. Even post-trial, Castillo refuses to accept that Ovalle-Martinez, Reynosa Galaviz, and others, would take advantage of her and use her name and her signature to traffic drugs and launder money in such a large scale international operation.

B. Castillo's Lack of Education

It is established in the PSR that Castillo had very little education, and only attended public school until the age of fourteen (14). She dropped out of school at the age of fourteen (14) to work and support her parents, brothers and sisters.

C. Castillo's Lack of Prior Criminal History

From the age of fourteen (14) until her current age of fifty-three (53), Castillo worked all her life in varying jobs. She never had any type of police record or legal problems until the instant case. No prior police record exists in Dallas, Texas, in Houston, Texas, or in her home town in Mexico with regard to Elisa Castillo.

D. Castillo's Prior Work History

Castillo began working at age fourteen (14) and never stopped working until her arrest at age fifty-three (53) (PSI 67). The numerous letters attached to this Sentencing Memorandum from her co-worker and family members attest to her hard work and the steady, reliable way in which she provided for her family. She began working at warehouses in Dallas, Texas, including

El Chico Warehouse and El Phoenix Warehouse, and as a security guard at a bowling alley (PSI 80). She also worked at Omega Optical in Dallas, Texas for a period of 23 years (PSI 79).

After moving to Houston, Texas Castillo began working at Lizma Tours as a ticket seller, ultimately becoming the owner of Lizma Tours on May 17, 2006. Her sole desire was to grow her business in a legitimate way, as confirmed by her honesty in maintaining a DOT registration and the registration of her business with the Harris County Clerk's office.

Upon the end of her incarceration, Castillo's desire is to work again to continue to provide for her children and grandchildren in her close-knit family (PSI 72).

E. Castillo's Modest Lifestyle and Work Ethic

Castillo maintained a modest bank account and lived in a home in Houston, Texas which only had an appraisal value of \$55,636.00. She worked all her life, from the age of fourteen (14) to her current age of fifty-three (53) to help first her siblings, and then to maintain her children in her close-knit family, in Dallas, Texas, Houston, Texas, and in Mexico. After a thorough investigation, the United States Government found no large sums of money in Castillo's name, no hidden bank accounts, and no expensive personal vehicles, which is commensurate with someone who was easily duped into being involved in a drug conspiracy while at the same time not benefitting financially in any obvious manner.

CONCLUSION

It is obvious from Castillo's modest lifestyle and steady, day to day work at her company that she did not earn a huge profit from the multi-kilogram, multi-million dollar scheme. The "warning bells" which should have sounded in the head of a reasonable, prudent, normal person simply were not triggered for Elisa Castillo when the Government's seizures of drugs and money began to transpire. She did not want to believe that she was being used in this manner.

Castillo had essentially "put on blinders" to the reality around her. Defendant believes that this factor and the others stated in this request would be grounds for a sentence variance under Title 18 §3553(a).

PRAYER

WHEREFORE, PREMISES CONSIDERED, Castillo prays that this Court will grant a downward departure or variance and sentence Castillo to ten (10) to fifteen (15) years of prison time, with the possibility for Parole, home detention and community service, and for all such other and further relief to which she is entitled.

Respectfully submitted,

/s/ Charles A. Bunker, III

CHARLES A. BANKER, III
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Federal No. 8965
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Houston, Texas 77002

Counsel for Defendant ELISA IDALIA CASTILLO

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of May, 2009, a true and correct copy of the foregoing Motion was delivered to the office of the Assistant United States Attorney assigned to handle this case.

To: Assistant United States Attorney
Bryan Best
United States Attorney's Office
P.O. Box 61129
Houston, TX 77208

/s/

CHARLES A. BANKER, III

APPENDIX

LETTERS FROM CO-WORKER AND FAMILY
MEMBERS
OF
ELISA IDALIA CASTILLO

March 25, 2009

To whom it may concern;

My name is Michelle Erven and I have been a co-worker and long time friend of Elisa Castillo. We worked together at an optical company in the 1980's to early 1990's. She was a good mentor and always willing to share her knowledge of the business so people could better understand the business. She was willing to learn new tasks in order to better herself so she could provide for her family.

When she left the company and moved to another optical company we would keep in touch through the years via phone. We would talk about work and about our children and how big they were getting and how old we were feeling.

Elisa has only wanted the best for her family and friends. She is a trustful and honest person. To my knowledge Elisa would never do harm to any individual or anything illegal intentionally or knowingly.

If I can be of any other assistance please contact me.

Michelle Erven
1822 Autumndale Dr
Grapevine TX 76051
817-424-3191

To whom it may concern... May 18, 2008

Just want to state; that I've known
Elisa Castillo for 20 years, and that
she was married to my brother Jesus
and that has passed away recently
from now and all this time that I've
known Elisa Castillo she has been a hard
working woman. She was a good wife to
my brother, and a good mother to her children
and until this day I have not known that
she has done anything wrong. You might say
that because she is my sister in law, I
would be saying good things about her,
but the only reason I say good things
about her is because that's the only
thing I've seen from her, and as a good
citizen of the United States I have
no reasons to give false testimonies.

Minister
2829 San Jacinto
Houston Texas.

05/14/2008

To whom it may concern,

Elisa Castilio is my sister-in-law. I cherish her as a person and have profound respect for her. She has overcome obstacles that many would have never thought possible. Elisa is truly a fighter in more ways than one. She is a source of great courage and strength. When our family has been faced with tragedy, she has always been there to give us faith and keep us motivated. Elisa is a kind and gentle soul who unfortunately was led into the wrong path. But family is not the same without her; she is the piece of the puzzle that is currently missing. Her children and grandchildren need her support and guidance.

Thank you for your time

Sincerely,

Julie

5/13/08

Elisa Castillo is my aunt
She is a very kind person
If I ever needed a ride to
School She would give me a
ride, or if I ever wanted
a snack from a vending machine
She would buy it for me.
I remember when ever I was hungry
She would always offer food
She was always willing to help
out someone in need.

Sincerely

Julio Alman

To whom it may concern:

Elisa Castillo is my mother. She has been hear since 1968. She has always been a hard worker to keep food on the table and a roof over our head. We recently lost my father in November 07. She is all we have left and she wouldnt leave us.

To whom it may concern. 5.14.08

My mother Elisa Castill was born in
Mexico of 1955. She was raised w/ 10 other
of her brothers and sisters. They later came
to my grandparents in Mex. later she married
my father Jesus (uno) which is Deceased since
November of 2007. She is a loving mother to
4 kind a role model for our relatives relatives.
She has always raised us w/ good morals.
and always been a best friend as well.
She ~~wanted~~ went to school @ North Texasland
high. Started working @ a young age
in Omega Optical where she worked
there since ~~she~~ around the age of 7- and
was nurse for 33 years and also after
that she worked @ Walmart Optical.
My mother is wrongfully accused. She is
a honest ~~were~~ woman. She is also
a hard working women. Our whole
family ~~stays~~ no lives in Dallas Dc.
My grandmother as well lives her in
Dallas, and she gets along with every
one. My mother has taught not only
her children good morales but has
always helped anyone that she can.
She would give her last dollar if someone
needed it. Always try nice and would put
others before herself. I always got on
to her about that because a lot
of people take advantage of her and

She would always tell me "It's always because
on God knows what's right" I mean
She felt good in her mind. And
My mother is very old fashion.
She is a wonder person and has
always been there for all of
us. She has a good reputation, will
never hurt anyone, and always
brings a smile to everyone that
crossed her path. We as a family
including relatives are very close
as we feel that she is unselfish
occused, and are willing to help
down the road. She can get along
We lost our father recently and
I am help taking care of my youngest
brother, sister, (a) the mom along
with my wife Neufay. We all need
her, and we love her so much.

Steve French
Mall

901415

To whom it may concern:

My name is Susanna Hernandez. This
castillo is my favorite. Last one
her been there for me. Well, I have
a lots of things to say about my
travels. I went back in time
back last my club. It was springtime
study time. It was springtime many
years ago. My mother just got us
no room see me at her house. My
mother had a girl named: So. She
call my aunt Cuban up. It was
very busy to ask her. So I just
told her. I could move in with her
but she didn't like that. So I told my mother
I could stay at Jones at Juanita's
I told my mother I could stay
in my room. So she told my
aunt Cuban in her house. My mother
guitar work do do put it in
to make one more. She were
for 2000. First she would work
each night. I would take the
bus to school. I would work out
very good. I had to go
be home for her sons and daughter

Mr. T. Elder would help
work them out. I recall myself
noticing him in the
post office. I see him go
work up some kind of
hard money. I think he

Elaine
Elaine

To whom it may concern,

My aupt, Elisa Cashillo is a very kind and thoughtful person. I have always admired and respected her sincerity and integrity. She helped raise me as a child and had a positive influence in my life. Through out my life; my aupt was a positive role model. If I ever needed anything; she was always there to lend a hand even if she did not have much herself. She is one of those people you rarely meet in life; who will literally give you the shirt off their back if you need it. Therefore, it came as a shock to me to hear that she was some how accused of participating in such criminal activity. I have faith in her innocence and know in my heart that she will surpass this. She is very lowkey and has a family that loves her and can not go on without her. my aunts thoughtless acts speak for themselves. I have a 3-yr old daughter named makayla who is the sunshine in my life. When makayla was a little under a year old, I was in desperate need of a child taker. The sudden and desperate need was due to a necessary change in employment. I researched many day cares, however, to my surprise all of them had waiting lists. This was not an option for me. my aupt willingly volunteered to watch over my daughter so I could work a day shift and keep my employment. keep in mind, she herself worked the graveyard shift at her place of employment from 6 am to 6 or 7 am. For about 4 months, she survived off of 2 to 4 hrs. of sleep a day. swinging as she would take care of my daughter all day long until about 5 pm.

complain, even though I could clearly see the tiredness and drawiness in her face and eyes. Not once did she demand money as payment for the child care services she provided. I paid her what I could when ever I was able to and even then; she refused to accept money from me. She would always state that she rather see me use the money for my daughter. I will always be eternally grateful to her for this amongst many other things. My aunt was there to lend a helping hand when no one else did and when I needed it most. She is of amazing character and I am truly blessed to have her as part of my life.

Sincerely,
Tricia Clempsey
TJ

Melissa Almanan
10818 Channel Dr.
Dallas, TX 75229
(469) 394-3943

5/4/08

Yo soy MARIA CASTILLO ES MI
HERMANA MENOR QUE YO
Y PASAMOS PARA LA
A LOS ESTADOS UNIDOS EN
EL AÑO 1968 Y ELMES
JULIO 22 Y RESPETO A
ELISA ELLA SIEMPRE HA SIDO
MUY TRAVASAR MUY CHIQUITA
SO A TRAVASAR MUY CHIQUITA
DE 15 AÑOS DE EDAD EN
EL CHICO CORPOREO CHON
EUGENIO PRIMER TRABAJO
QUE TUVIMOS CON MY PAPY
SILVIA Y BETO Y ELISA
DESPUES TRABAJO EN EL
FINEX CORPORACION Y LUEGO
TRABAJO EN LA OMEGA OPTICA
POR 23 AÑOS Y TAN VIEJO
OPTICA DONDE HABIA LENTE
Y OJO AI SE FUE A CUSTON
EN EL AÑO 2006 Y SIEMPRE
FODOS SON MADS MUY UNIDOS
Y TODA LA FAMILIA ESTA A
DUX EN DALLAS Y AORA
QUE ELISA SE FUGA A
ESTONIA NOS AVIAMOS
POR TELFONO Y TAN VIEJO
NOS VISTAMOS

A quien corresponda, May 14, 2008

Yo soy Sylvia Aleman y Elsa Castillo es mi hermana venida de Mexico en Julio de 1988. Elsa trajo a Puerto Mico en Septiembre. Comenzó a ir a la escuela, al igual que mis hermanas mas pequeñas. Poco el tiempo y empezo a trabajar para ayudar a mis padres por que ella siempre ha sido una persona muy responsable y cooperadora. Trabajo en la Omega Optical por 23 años y en la Walmart Opticul 3 años. Pero aproximadamente 2 años decidio moverse para Houston, Tx. Yo la he extrañado mucho, porque de todos mis hermanas ella ha sido con la que mejor me ha llevado. Yo la admiro mucho y nos respetamos mucho los dos. Siempre cuando tengo un problema no dudo en acudir a ella porque yo sé que ella no me va a decir que no. Pues ella siempre tiene soluciones para todo. Es una persona digna de confianza en la que cualquier persona puede confiar. Recuerdo una anecdota que nunca se me

dividara. Cuando a una vez que fuimos a Mexico mis papas y yo, ella no fue y cuando llegamos de Mexico mama andaba buscando una Colchon que no encontraba y le pregunto a ella si sabia y ella contesto "es que vine una Señora que acaba de llegar de Mexico y no tenian nada y se la di", y mi mama dijo enojada que enci la Colchon que acababa de Comprar. Como Comprendieran ella. Siempre ha sido una persona muy amable, muy generosa y Cariñosa y yo no dudaria en recomendarla a quien fuera porque es una gran persona yo y mi familia la queremos mucho y sus hijos tenemos al igual que mi mama y sus hijos. Espero que mis palabras no se las lleve el viento y las tomen en consideracion.

Agradeciendo de
Antemano Su
Atencion despido atte

Diputado Alvarado

To whom it may concern

Elisa T. Castillo is my mother. She is a very nice and caring person. She has always put others before her. When we would buy take out food, she would offer her plate. Visit she wasnt hungry and pretend she wasnt visiting just so that the person visiting would eat. even if she didn't know them. She always tries to help whenever she can. She is nice and sometimes lot of people would take advantage of her kindness. My mother is an honest person. She has never been in trouble. She has been here since she was a teen. She didn't finish school because she had to work to help her family. She worked at this one place for about 23 years called Omega Optical. We had a house in dallas tx were we lived since I was in second grade think 1992. We lived there for a long time think like 2003 then we had to move out. My mom has always worked hard all her life. At one point she was working 2 jobs. Only getting about 3 or 4 hours of sleep a day. We recently lost my dad in November 9, 2007. That

was really hard on us. My mother is all we have left. She wouldn't leave us for the world. She has always helped me and my son out. We have gone through a lot and she has always been there to make us feel better. She is the greatest person if you get a chance to know her. Everyone that knows her would tell you the same. I am the youngest girl of the 4 children. And we all need her.

Media Case

05/13/08

A Quien Corresponda

La Sra Elisa Castillo es Hermana de
m. Espoz Gloria Escobar Estoy Soñando
de lo que mi Espoz me comentó
de la situación de Elisa.
Elisa ha trabajado toda su vida a sueldo
mucho por sus hijos desafortunadamente
has parejas que a escogido nunca han sido
personas responsables. Elisa a trabajado dia
y noche por temporadas para sacar
adelante a la familia por eso les pido
por favor me ayuden a enderezar
este problema por ella y por sus hijos
que estan sufriendo por la situación de
su madre y lo que mi sufrido
en el pasado gracias por su atención
y gracias.

J. Ochoa

To whom it may concern:

ELISA Castillo is my sister. She is a caring mother of four children. She worked at Omega Optical for 23 years. She is needed in our life, she helps take care of her 83 y/o mother. She has always been a great help to the family. She has lived in the U.S. since 1968. I hope you take her letter into consideration as her family means a lot to her. She is very much. She is greatly needed in the family.

Yours sincerely

01/31/08

To whom it may concern:

Elisa Costillo is my aunt. She has always been a part of my life and has shown me many things. She has always been there for me and has been caring. She cares for my 83 yr grandmother which makes and nido her very much. I hope you take this letter into consideration, her family and grandkids need her.

Marilyn Esteban